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**Florida
Power**
CORPORATION

January 18, 1985
3F0185-07

Mr. J. P. O'Reilly
Regional Administrator, Region II
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
101 Marietta Street N.W., Suite 2900
Atlanta, GA 30323

Subject: Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72
IE Inspection Report No. 84-34

Dear Mr. O'Reilly:

Florida Power Corporation provides the attached as our response to the subject inspection report.

Sincerely,

G. R. Westafer
Manager, Nuclear Operations
Licensing and Fuel Management

AEF/feb

Attachment

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PDR ADOCK 05000302
G PDR

**FLORIDA POWER CORPORATION
RESPONSE
INSPECTION REPORT 84-34**

VIOLATION 84-34-03

10CFR50.54(a)(1) requires Florida Power Corporation (FPC) to implement the quality assurance program described or referenced in the Safety Analysis Report. Section 1.7.1.5 of FPC's QA Program requires that activities affecting quality be performed in accordance with documented instructions and procedures of a type appropriate to the circumstances.

Contrary to the above, the following examples of inadequate procedures were identified:

- a. Surveillance Procedure SP-157, Meteorological System Surveillance did not require the testing of the four equipment malfunction alarms for Meteorological Tower 2.
- b. The Quality Engineering Inspection Plan assigned to Work Request #52533 required only one sign-off for the material verification at different periods of time for parts installed on 30 safety-related circuit breakers.

This is a Severity Level V violation (Supplement I).

RESPONSE A

FLORIDA POWER CORPORATION POSITION:

Florida Power Corporation does not agree that this item is an example of a violation. At the time of the inspection, Meteorological Tower 2 had not been placed in service for the first time and was not required to be operational; although the electronic components had been energized for testing. Therefore, surveillance procedures for this equipment were not required to be performed. Procedures are continuously updated to incorporate surveillance requirements for new equipment. This continuous process may result in routine surveillances being performed to assure adequacy and correctness, prior to declaring the equipment operable. The surveillance steps observed during the inspection were not required to be performed and could not have affected plant safety. No procedures in place at that time directed the use of data from Meteorological Tower 2, thus data from the tower could not be used for safety-related activities. However, the NRC concern regarding the testing of the four equipment malfunction alarms for Meteorological Tower 2 will be addressed in applicable procedures.

RESPONSE B

(1) **FLORIDA POWER CORPORATION POSITION:**

Florida Power Corporation concurs with this item of the stated violation.

(2) **APPARENT CAUSE OF VIOLATION:**

A review of the events surrounding this violation indicate the cause is personnel error.

(3) CORRECTIVE ACTIONS:

A list of the safety-related breakers was developed, attached to the inspection plan, and incorporated into the work package. The list will provide a means for providing objective evidence of specific inspection results for each breaker.

(4) ACTION TAKEN TO PREVENT RECURRENCES:

A review was conducted by Quality Engineering personnel of related maintenance, modification, and inspection planning procedures to evaluate their effectiveness in these applications. Quality Engineering personnel responsible for inspection plan development have reviewed the violation and the circumstances involved. A revision to the training instruction for inspection planning will be made. This will provide further guidance in this area to assure that a more comprehensive review is conducted.

(5) DATE OF FULL COMPLIANCE:

Full compliance will be achieved by February 15, 1985.